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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

DAVID VANDERKLIPP, an individual,  
  
Plaintiff,  
  
vs.  
  
PREMIUM WATERS, Inc., a Foreign Corporation,  
  
Defendant.

CASE NO: 2:24-cv-00920-JAD-BNW

**STIPULATION AND ORDER TO  
EXTEND TIME TO RESPOND TO  
DEFENDANT PREMIUM WATERS,  
INC.'S MOTION FOR SUMMARY  
JUDGMENT  
(ECF #18)  
(First Request)**

COMES NOW, Plaintiff, DAVID VANDERKLIPP, (hereinafter "Plaintiff"), by and through his counsel of record, Trevor J. Hatfield, Esq., of the law firm of Hatfield & Associates, Ltd., and Defendant PREMIUM WATERS, INC., (hereinafter "Defendant"), by and through its counsel, the KAMER ZUCKER ABBOTT, do hereby stipulate and agree to extend time for Plaintiff to respond to Defendant's Motion For Summary Judgment (ECF #18), due on April 10, 2025, to April 25, 2025. This request is submitted pursuant to LR IA 6-1, 6-2 and LR 7-1 and is the parties' first request for an extension of time for Plaintiff to respond to Defendant's Motion for Summary Judgment. Additionally, the parties would like to request that Defendant be given until May 23, 2025, to Reply to Plaintiff's Response to Defendant's Motion for Summary Judgment.

Good cause exists for this extension. Plaintiff is working with the client regarding the undisputed facts as asserted by Defendant regarding Defendant's Motion for Summary Judgment to formulate Plaintiff's response. The parties believe a 15-day extension will suffice.

Defendant has courteously agreed to this extension of time for Plaintiff to file his Response. Accordingly, **Plaintiff shall have up to and including April 25, 2025, to respond to Defendant's Motion for Summary Judgment (ECF #18).**

In addition to this extension, Defendant has requested that they be granted a similar extension for their Reply. Parties agree that **Defendant shall have up to and including May 23, 2025, to respond to Plaintiff's Response to Defendant's Motion for Summary Judgment.**

**IT IS SO STIPULATED.**

Dated: April 9, 2025

**HATFIELD & ASSOCIATES**

*/s/ Trevor J. Hatfield*  
By: \_\_\_\_\_  
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Dated: April 9, 2025

**KAMER ZUCKER ABBOTT**

*/s/ Dare E. Heisterman*  
By: \_\_\_\_\_  
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*Attorneys for Defendant*

**ORDER**

**Based on the parties' stipulation [ECF No. 20], and with good cause appearing, IT IS SO ORDERED.**

  
\_\_\_\_\_  
DISTRICT COURT JUDGE  
4/14/25, nunc pro tunc to 4/10/25